



Domestic Members

AmerenUE
Callaway
American Electric Power Co.
D.C. Cook 1 & 2
Arizona Public Service Co.
Palo Verde 1, 2 & 3
Constellation Energy Group
Calvert Cliffs 1 & 2
R. E. Ginna
Dominion Nuclear Connecticut
Millstone 2 & 3
Dominion Virginia Power
North Anna 1 & 2
Surry 1 & 2
Duke Energy
Catawba 1 & 2
McGuire 1 & 2
Entergy Nuclear Northeast
Indian Point 2 & 3
Entergy Nuclear South
ANO 2
Waterford 3
Exelon Generation Company LLC
Braidwood 1 & 2
Byron 1 & 2
FirstEnergy Nuclear Operating Co.
Beaver Valley 1 & 2
FPL Group
St. Lucie 1 & 2
Seabrook
Turkey Point 3 & 4
Nuclear Management Co.
Kewaunee
Palisades
Point Beach 1 & 2
Prairie Island 1 & 2
Omaha Public Power District
Fort Calhoun
Pacific Gas & Electric Co.
Diablo Canyon 1 & 2
Progress Energy
H. B. Robinson 2
Shearon Harris
PSEG - Nuclear
Salem 1 & 2
South Carolina Electric & Gas Co.
V. C. Summer
Southern California Edison
SONGS 2 & 3
STP Nuclear Operating Co.
South Texas Project 1 & 2
Southern Nuclear Operating Co.
J. M. Farley 1 & 2
A. W. Vogtle 1 & 2
Tennessee Valley Authority
Sequoyah 1 & 2
Watts Bar 1
TXU Power
Comanche Peak 1 & 2
Wolf Creek Nuclear Operating Corp.
Wolf Creek

International Members

British Energy plc
Sizewell B
Electrabel
Doel 1, 2, 4
Tihange 1 & 3
Electricité de France
Kansai Electric Power Co.
Mihama 1
Takahama 1
Ohi 1 & 2
Korea Hydro & Nuclear Power Co.
Kori 1 - 4
Ulchin 3 - 6
Yonggwang 1 - 6
NEK
Krško
NOK
Kemkraftwerk Beznau
Ringshals AB
Ringshals 2 - 4
Spanish Utilities
Asco 1 & 2
Vandellós 2
Almaraz 1 & 2
Taiwan Power Co.
Maanshan 1 & 2

Project Number 694

July 19, 2005

WOG-05-339

U. S. Nuclear Regulatory Commission

Attn: Christopher I. Grimes, Deputy Director for
Division of Engineering
Office of Nuclear Reactor Regulation

One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738

Subject: Westinghouse Owners Group
Information Copy of CROSSFLOW Ultrasonic Flow Meter User
Guidelines, WCAP-16437-P (Proprietary)

Reference(s) 1) Letter, F. P. Schiffler, II (WOG) to C. I. Grimes (NRC),
"Westinghouse Owners Group, Assurance that CROSSFLOW
Technology, Installation, and Operation Maintain Design and
Licensing Basis (Proprietary)", WOG-04-622, December 10, 2004

In December, 2004, the Westinghouse Owners Group (WOG) provided the Nuclear Regulatory Commission (NRC) assurance that CROSSFLOW Ultrasonic Flow Measurement System (CROSSFLOW) technology, installation, and operation maintained the design and licensing basis (Reference). As part of that assurance, the WOG CROSSFLOW Task Force (CTF) indicated that it was preparing comprehensive User Guidelines to assist the operator or systems engineer to evaluate, diagnose, trend and use the output from the CROSSFLOW system. The intent of the Guidelines would be to 1) assist the utility in evaluating its current operating procedure(s) or to develop enhanced procedures, 2) provide a consistent industry process of data evaluation and 3) to assure that industry events are considered and included in each plant's operating procedures.

The WOG is pleased to report that these Guidelines have been completed and disseminated to participating members. Depending on the CROSSFLOW system installed at each plant and the potential interface with the plant computer, the implementation of the Guidelines will vary from plant to plant. In support of our commitment to maintain open communication channels with the NRC staff, the WOG CTF is providing herewith (Enclosure 1-P) an information copy of the completed

CROSSFLOW User Guidelines, which is proprietary in its entirety. The WOG CTF expects to treat these Guidelines as a living document and update them from time-to-time as operating experience and technology advancements dictate. Please note that these Guidelines are provided for information purposes only and that formal review of the document is not requested. Consequently, NRC fees are not expected.

Enclosure 2 contains:

1. One (1) copy of the Application for Withholding, CAW-05-2030
2. One (1) copy of Affidavit (Attachment to CAW-05-2030)
3. Proprietary Information and Copyright Notices

Enclosure 1-P contains information proprietary to Westinghouse and the Advanced Measurement and Analysis Group (AMAG), our CROSSFLOW technology partner. On behalf of Westinghouse and AMAG, this classification is supported by an affidavit signed by Westinghouse, an owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.390 of the Commission's regulations. Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390. A non-proprietary version of the Guidelines is not available since the document is not intended for distribution to parties outside of Westinghouse/AMAG or the WOG CTF participants.

Correspondence with respect to the Application for Withholding should reference CAW-05-2030 and should be addressed to:

J. A. Gresham, Manager
Regulatory Compliance and Plant Licensing
Westinghouse Electric Company LLC
P. O. Box 355
Pittsburgh, PA 15230-0355.

Correspondence related to the information transmitted herewith should be addressed to:

Mr. Gordon Bischoff, Program Manager
Westinghouse Owners Group
Westinghouse Electric Company (Mail Stop ECE 5-16)
P. O. Box 355
Pittsburgh, PA 15230-0355

If you have questions regarding this submittal, feel free to contact Mr. Steve Lurie (Westinghouse) at (860) 731-6241 or Mr. Paul Hijeck in the WOG Program Management Office at (860) 731-6240.

Sincerely,

A handwritten signature in cursive script that reads "Gordon C. Bischoff" followed by a small "for" and a flourish.

Frederick. P. "Ted" Schiffley, II, Chairman
Westinghouse Owners Group

FPS:PJH:las

xc:	CROSSFLOW Task Force	G. C. Bischoff, (W)
	Project Management Office	C. B. Brinkman, (W)
	Management Committee	J. A. Gresham, (W)
	I. Ahmed, NRC (w/enclosures)	S. M. DiTommaso, (W)
	J. A. Calvo, NRC	C. T. French, (W)
	R. A. Gramm, NRC	J. J. McInerney, (W)
	A. G. Howe, NRC	C. Savage, (W)
	G. S. Shukla, NRC	C. Molnar, (W)
	W. M. Turkowski, (W)	K. Brode, (W)
	P. Hijeck, (W)	A. Lopez, (AMAG)
	S. Lurie, (W)	V. Askari, (AMAG)

Westinghouse Proprietary Class 2

Enclosure 1-P to WOG-05-339

Westinghouse Owners Group CROSSFLOW Task Force

CROSSFLOW Ultrasonic Flow Measurement System

User Guidelines

June, 2005

This document is the property of and contains Proprietary Information owned by Westinghouse Electric Company LLC and/or its subcontractors and suppliers. It is transmitted to you in confidence and trust, and you agree to treat this document in strict accordance with the terms and conditions of the agreement under which it was provided to you.

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Enclosure 2

Westinghouse Electric Company LLC

CAW-05-2030

**Application For Withholding Proprietary
Information From Public Disclosure**



Westinghouse Electric Company
Nuclear Services
P.O. Box 355
Pittsburgh, Pennsylvania 15230-0355
USA

U.S. Nuclear Regulatory Commission
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11555 Rockville Pike
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e-mail: greshamja@westinghouse.com
Project No.: 694

Our ref: CAW-05-2030

July 19, 2005

**APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE**

Subject: Information Copy of CROSSFLOW Ultrasonic Flow Meter User Guidelines, WCAP-16437-P (Proprietary)

Reference: Letter, F. P. Schiffley, II (WOG) to C. I. Grimes (NRC), "Information Copy of CROSSFLOW Ultrasonic Flow Meter User Guidelines, WCAP-16437-P (Proprietary)," WOG-05-339, July 19, 2005

The application for withholding is submitted by Westinghouse Electric Company LLC (Westinghouse), a Delaware limited liability company, pursuant to the provisions of paragraph (b)(1) of Section 2.390 of the Commission's regulations. It contains commercial strategic information proprietary to Westinghouse and customarily held in confidence.

The proprietary material for which withholding is being requested is contained in the proprietary version of the subject report. In conformance with 10 CFR Section 2.390, Affidavit CAW-05-2030 accompanies this application for withholding, setting forth the basis on which the identified proprietary information may be withheld from public disclosure.

Accordingly, it is respectfully requested that the subject information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to this application for withholding or the accompanying affidavit should reference CAW-05-2030 and should be addressed to J. A. Gresham, Manager, Regulatory Compliance and Plant Licensing, Westinghouse Electric LCC, P. O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. A. Gresham', written over a horizontal line.

for J. A. Gresham, Manager
Regulatory Compliance and Plant Licensing

- (1) I am G. C. Bischoff, Project Manager, Westinghouse Owners Group, in Nuclear Services, of the Westinghouse Electric Company LLC (Westinghouse), a Delaware limited liability company and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rulemaking proceedings, and am authorized to apply for its withholding on behalf of the Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Westinghouse application for withholding accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by the Westinghouse in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) Pursuant to the provisions of paragraph (b)(4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Westinghouse.
 - (ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitutes Westinghouse policy and provides the rational basis required. Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:
 - (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of Westinghouse's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.
 - (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
 - (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
 - (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.
 - (e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.
 - (f) It contains patentable ideas, for which patent protection may be desirable.

There are sound policy reasons behind the Westinghouse system which include the following:

- (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
- (b) It is information which is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.
- (c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.
- (d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.

- (e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.
- (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 3.790, it is to be received in confidence by the Commission.
- (iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
- (v) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in Enclosure 1-P to WOG-05-339, "Information Copy of CROSSFLOW Ultrasonic Flow Meter User Guidelines, WCAP-16437-P (Proprietary)," July 19, 2005, for submittal to the Commission and Application for Withholding Proprietary Information from Public Disclosure, to the NRC Document Control Desk. The proprietary information as submitted for use by Westinghouse is expected to be applicable in other licensee submittals in response to certain NRC requirements for justification of the application of the CROSSFLOW Ultrasonic Flow Measurement System.

This information is part of that which will enable Westinghouse to:

- (a) Assure CROSSFLOW Ultrasonic Flow Measurement System technology, installation, and operation maintains the design and licensing basis.
- (b) Support licensees in implementing the CROSSFLOW Ultrasonic Flow Measurement System within its approved accuracy limit.

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of similar information to its customers for purposes of meeting NRC requirements for licensing documentation.
- (b) Westinghouse can sell support and defense of CROSSFLOW Ultrasonic Flow Measurement System performance within its approved accuracy limit.
- (c) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar technical evaluation justifications and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended for developing the enclosed improved core thermal performance methodology.

Further the deponent sayeth not.

Proprietary Information Notice

Transmitted herewith is the proprietary version of a document furnished to the NRC for information purposes only. This document is proprietary in its entirety and a non-proprietary version is not available since the document is not intended for distribution to parties outside of Westinghouse/AMAG or the WOG CTF participants.

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